

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

REVITY ENERGY, LLC PETITION
FOR DECLARATORY JUDGMENT

Docket No. 5235

**GREEN DEVELOPMENT, LLC'S
RESPONSE TO DIVISION'S SECOND SET OF
DATA REQUESTS**

(April 29, 2022)

Div 2-1 (a) When exactly did Green become aware that the conduit it was constructing would be subject to cost sharing? and (b) When exactly did Green become aware that Revity would require space in the conduit Green was constructing?

Reply:

(a) Cost sharing was first discussed at a Nooseneck project meeting with the Company held on June 3, 2020. With respect to the additional pipes requested by National Grid to enlarge the duct bank from 2-way to 4-way, Green requested reimbursement from the Company and the Company informed Green that (per meeting notes distributed on June 9, 2020) "National Grid will not be reimbursing Green for the additional pipes as we will be allowing for future cost sharing." The meeting notes made it clear that fair cost sharing of the West Greenwich duct bank work was allowed, and this fact was a critical condition precedent to Green agreeing to sign these two Interconnection Service Agreements executed only a month after that meeting and the subsequent written confirmation regarding cost sharing.

After repeated requests for a cost-sharing mechanism, on October 20, 2021, the Company committed that cost sharing would apply and that the pro-rata share of cost allocated to Green Development would be 28.3 percent. The Company required Green to provide a detailed cost estimate for review and approval. Green produced a line-item estimate of costs and has updated that with line-item accounting of any actual costs in accordance with Company requests.

(b) Green was aware that Revity had a project that would be relying on these conduit upgrades, through publicly available information, when National Grid informed Green of cost sharing on June 3, 2020. On June 9, 2020, Narragansett first informed Green of its intent to cost share its installation of a 1000 kcmil cable in order to accommodate additional customers, which Green knew to include the renewable energy project proposed by Revity. The Company then produced a design package requiring Green to install 6- way and 4-way conduit duct bank in various locations for the project. The additional ducts were intended for the Company and for other distribution customers.